

**FILED**

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT TEXAS  
MIDLAND DIVISION**

**2016 DEC -8 PM 5: 02**

**CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS**

**BY**  **DEPUTY CLERK**

**UNITED STATES OF AMERICA, )  
Respondent, )**

**Vs. )**

**7:07-cr-00119-RAJ-8**

**CRYSTAL MUNOZ, )  
Defendant. )**

**MOTION FOR RECONSIDERATION**

**COMES NOW, CRYSTAL MUNOZ, DEFENDANT in the above styled and  
entitled cause of action who respectfully moves this Honorable Court for Reconsideration  
of the Reduction in the imposed term of 235 months handed down on 01/24/2008.**

**In support of this Motion Defendant submits the following;**

**On 03/31/2015 the Court reduced the 235-month term previously imposed  
upon the Defendant to 188 Months, this was pursuant to 18 U.S.C § 3582(c)(2) for a  
reduction in the term of imprisonment imposed based on a guideline sentencing range that  
had subsequently been lowered and made retroactive by the United States Sentencing  
Commission. The calculation was at the upper end of the Guideline chart. While  
Defendant is most appreciative of the reduction to 188 months, she requests  
Reconsideration by the court of reducing the term to the lower end of the guideline chart.  
Such a reduction to the lower end of the guideline chart will not affect an immediate  
release, but will place Defendant Munoz closer to a release date for the purposes of access  
to other programs that will prove invaluable to her growth and transition to reentry.**

**Defendant submits that she can demonstrate the years of positive  
programming since she has been incarcerated. The many courses taken in order to improve  
herself and the transformation of the journey to redemption and rehabilitation.**

**Defendant Munoz has been able to maintain a positive attitude through the**

1 support of her Husband and other family members as the years have passed and the  
2 children are growing up without her. This experience has been quite traumatic for all  
involved, especially the children.

3 Defendant requests of the court to consider an act of Compassion and Mercy by  
4 Granting Reconsideration of revisiting the reduction of the sentence previously adjusted  
5 pursuant to the retroactive Amendment.


6 Defendant Munoz prays that the Honorable Court will;

7 (a) Grant the Motion for Reconsideration; and

8 ,  
9 (b) Any other relief this court deems just and proper.

10  
11 Respectfully Submitted,

12 On this<sup>30</sup> day of 11, 2016

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14   
15 Crystal Munoz  
16 #79319-180  
17 Federal Medical Center, Carswell  
18 Satellite Camp  
19 P.O. Box 27137  
20 Fort Worth, TX 76127  
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24  
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